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10 Attorneys for Plaintiff

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15  
16 UNITED STATES OF AMERICA,                           } CR No. 07-00698-MMC  
17         Plaintiff,    }  
18         v.    } STIPULATION AND [PROPOSED]  
19         ALIREZA RAHMANI,                                  } PROTECTIVE ORDER UNDER FED. R.  
20         Defendant.    } CRIM. P. 16  
21

22 On April 9, 2008, the parties in this case appeared before the Court and addressed the need  
23 for the following protective order. After that hearing, at which both parties were heard, the  
24 Court issues the following Protective Order, to which both parties have stipulated.

25   **PROTECTED MATERIAL**

26         The government has provided defense counsel with redacted portions of two digital  
27         images. Those documents are bates-labeled USA-000109 and USA-000110, and are the  
28         //

1 "Protected Material." Pending the issuance of this Order, defense counsel agreed not to  
2 disseminate the Protected Material to any person outside its law firm.

3 **PROTECTIVE ORDER**

4 Pursuant to Federal Rule of Criminal Procedure 16, good cause exists for entry of a  
5 protective order for the above-described documents and disclosure of these materials shall be  
6 subject to the following restrictions:

7 **1. Protected Material**

8 Possession of copies of the Protected Material is limited to: (1) attorneys for defendant  
9 Alireza Rahmani, specifically Robert Beles, Annie Beles, Jamil Karwash, and other attorneys at  
10 the Law Office of Robert Beles law firm; and (2) their respective investigators, experts, and  
11 paralegals. Those people are collectively referred to as the "Defense Team."

12 The Defense Team shall shall not provide copies of the Protected Material to any other  
13 person, shall not duplicate the Protected Material, and shall not disseminate any copies of the  
14 Protected Material to any other person. The Defense Team may show the Protected Material  
15 only to the defendant and only in conjunction with their defense of him in this case. At no time  
16 will any copies of the Protected Material be left in the custody of the defendant or any other  
17 person. The Defense Team is prohibited from using the Protected Material for any purpose other  
18 than defending the defendant in this case

19 Further, the defendant's attorneys shall, prior to disseminating any copies of the  
20 Protected Material to other members of the Defense Team, review this Order and provide a copy  
21 of this Order to each member of the defense team.

22 This Order shall be binding on all subsequent attorneys who represent the defendant in  
23 this case and on any other person who becomes a member of the Defense Team or comes into  
24 possession of Protected Material.

1           **2. Non-termination**

2           The provisions of this Order shall not terminate at the conclusion of this prosecution but  
3 only upon further order of this Court.

4

5

6 SO STIPULATED:

7           JOSEPH P. RUSSONIELLO  
8           United States Attorney

9

10 DATED: April 21, 2008

/s/

11 TAREK J. HELOU  
12 Assistant United States Attorney

13 DATED: April 21, 2008

/s/

14 ANNIE BELES  
15 Attorney for Defendant Alireza Rahmani

16

17 SO ORDERED.

18

19 DATED: April 22, 2008

20   
21 THE HONORABLE MAXINE M. CHESNEY  
22 United States District Judge